

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al, No. 04-CV-1923
Euro Brokers Inc., et al., v. Al Baraka, et al., Case No. 04 Civ. 7279

**DEFENDANTS WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA
AND WORLD ASSEMBLY OF MUSLIM YOUTH INTERNATIONAL RULE
26(a)(1) SECOND SUPPLEMENTAL INITIAL DISCLOSURES**

Defendants World Assembly of Muslim Youth Saudi Arabia (“WAMY”) and World Assembly of Muslim Youth International (“WAMY International”), by and through their undersigned counsel, make the following supplemental initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). These supplemental initial disclosures are based on information reasonably available to Defendants as of the date hereof. The disclosures herein are provided without prejudice to the rights of Defendants to identify additional witnesses or evidence. Further, Defendants reserve the right to supplement these initial disclosures.

Individuals Who May Have Relevant Discoverable Information

Defendants identify the following individuals who may have relevant discoverable information:

1. Saleh Al-Wohaibi. Secretary General of WAMY, 2002 to present.

Address: Can be reached through undersigned counsel

Subjects of information: WAMY history, policies and procedures.

2. Dr. Tawfeeq ibn Ahmed al Qusayyer. Former Secretary General of WAMY, 1981-1986.

Address: Unknown

Subjects of information: WAMY history, policies and procedures.

3. Dr. Ahmad Abdul Qadir Bahafidhallah. Former Secretary General of WAMY, 1978-1981.

Address: Unknown.

Subjects of information: WAMY history, policies and procedures.

4. Dr. Abdul Hameed Abu Soliman. Former Secretary General of WAMY, 1973-1978.

Address: Unknown

Subjects of information: WAMY history, policies and procedures.

5. Ibrahim Abdullah. Former Director, WAMY International, 1999-2004.

Address: Jeddah, Saudi Arabia

Subjects of information: WAMY International operations and WAMY Canada.

6. Majid Entebbe. Formerly involved with Lajnat El Birr Islamia (LBI).

Address: Can be reached through undersigned counsel

Subject of information: LBI

7. Ibrahim Anwar. Executive Director WAMY Pakistan.

Address: Can be reached through undersigned counsel

Subject of information: WAMY Pakistan.

8. Anwar Ibrahim. Student of WAMY. Former Minister of Malaysia.

Address: Malaysia

Subjects of information: former student of WAMY.

9. Dr. Abulwahab Noorwali. Former LBI Board member and former WAMY Assistant General Secretary.

Address: Can be reached through undersigned counsel

Subjects of information: WAMY Jeddah and international operations, LBI.

10. Shahir Batterjee. Original board member of LBI.

Address: Jeddah, Saudi Arabia

Subjects of information: LBI.

11. Rustam Shah Mahmand. Former Minister of Pakistan.

Address: Pakistan

Subjects of information: WAMY activities in Pakistan.

12. Talha Al Jarad. Former Director, WAMY Canada.

Address: Riyadh, Saudi Arabia

Subjects of information: WAMY Canada.

13. Mohamed Mustafa Mohamed. Former Executive Director, LBI and WAMY, Pakistan.

Address: Sudan

Subjects of information: LBI operations in Pakistan.

14. Ahmed Tutonji. Co-founder of WAMY

Address: Riyadh, Saudi Arabia

Subjects of information: WAMY history.

15. Mustafa Osman Ismail. Chairman of Board of Trustees, Khartoum University, former Secretary of State of Sudan.

Address Khartoum, Sudan

Subjects of information: WAMY youth operations in Europe, former student of WAMY.

16. Adam Leach. Chief Executive Youth Care International, London.

Address: United Kingdom

Subjects of information: WAMY operations in Europe.

17. Adel Hamad. Former employee of WAMY.

Address: Unknown

Subjects of information: low level employee of WAMY with knowledge on plaintiffs' allegation about his activities and actions in Pakistan.

18. Mohamed Khatib. Former Executive Director, WAMY Canada.

Address: Canada

Subjects of information: WAMY Canada.

19. Nouredine Miladi. Former Executive Director, WAMY United Kingdom

Address: Qatar

Subjects of information: WAMY United Kingdom.

20. Ziaul Haq Amarkhil. Chairman, National Stability Society. Former student at WAMY School in Peshawar, Pakistan 1999-2001.

Address: Kabul, Afghanistan

Subjects of information: WAMY programs in Pakistan and Afghanistan.

21. Ibrahim El Zayat. Former director of WAMY, Europe operations,

Address: Germany

Subjects of information: WAMY Western Europe operations.

22. Enaam Arnaout. Former Director of Benevolent International Foundation and Benevolent International Committee.

Address: Unknown

Subjects of information: Benevolent International Foundation and Benevolent International Committee.

23. Colonel Lawrence Wilkerson. United States Army

Address: Virginia, USA

Subjects of information: Wrongful detention of Adel Hamad.

24. Abdullah Gul. Former President of Turkey.

Address: Istanbul, Turkey

Subjects of information: WAMY operations, youth activities and programs.

25. Babiker Mahdi Khojali. WAMY's Internal Auditor.

Address: Riyadh, Saudi Arabia

Subjects of information: WAMY financial records and book keeping practice.

26. Muhammed Abdul-Hamid. WAMY's External Auditor

Address: Jeddah, Saudi Arabia

Subjects of information: WAMY financial records and book keeping practice.

27. Shahzada Shaed. Member of Parliament Afghanistan.

Address: Afghanistan

Subjects of information: WAMY programs and projects in Afghanistan.

28. Rooh Ullah Madani. Former minister of Awqaf and Islamic Affairs, Sarhad Pakhtunkwa, Pakistan, and Board of Trustee member at WAMY's school in Peshawar, Pakistan.

Address: Peshawar, Pakistan

Subjects of information: WAMY programs and projects in Pakistan.

29. Assadullah Sahil. Senior Program Officer at United States Institute of Peace, and graduate of WAMY's school in Peshawar, Pakistan.

Address: Afghanistan

Subjects of information: WAMY programs in Pakistan and Afghanistan.

30. Fida Mohammad Awab. Senior employee at WAMY Pakistan office.

Address: Pakistan

Subjects of information: WAMY programs in Pakistan and Afghanistan.

December 31, 2015

/s/ Omar Mohammedi

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Saudi Arabia and World Assembly of Muslim Youth
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